

McGlinchey Stafford

112 West 34th Street, Suite 1515

New York, New York 10120

T: 646 362-4055

F: 646-439-8059

Brian S. McGrath, Esq.

Kristen D. Romano, Esq.

Hearing Date: August 29, 2018

Hearing Time: 10:00 am

Objections Due: August 22, 2018

*Counsel for Defendants Deutsche Bank National Trust Company,
as Trustee for First Franklin Mortgage Loan Trust 2006 FF9,
Mortgage Pass-Through Certificates, Series 2006-FFP and
Specialized Loan Servicing, LLC*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|-----------------------------------|---|-----------------------|
| In re: | : | Chapter 13 |
| | : | |
| KAREN T. BELTRAN, | : | |
| | : | Case No. 17-22419-rdd |
| Debtor, | : | |
| | : | |
| | : | |
| GUSTAVIA HOME, LLC, | : | |
| | : | Adversary Proceeding |
| Plaintiff | : | No. 17-08233-rdd |
| | : | |
| -against- | : | |
| | : | |
| DEUTSCHE BANK NATIONAL TRUST | : | |
| COMPANY, AS TRUSTEE FOR FIRST | : | |
| FRANKLIN MORTGAGE LOAN TRUST 2006 | : | |
| FF9, MORTGAGE PASS-THROUGH | : | |
| CERTIFICATES, SERIES 2006-FF9, | : | |
| SPECIALIZED LOAN SERVICING, LLC | : | |
| | : | |
| Defendants. | : | |

NOTICE OF MOTION BY DEFENDANTS FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE, that on August 29, 2018, at 10:00 a.m., Deutsche Bank National Trust Company, as Trustee for First Franklin Mortgage Loan Trust 2006 FF9, Mortgage Pass-Through Certificates, Series 2006-FFP and Specialized Loan Servicing, LLC (collectively,

“Defendants”) by and through their attorneys, McGlinchey Stafford, PLLC, will bring their motion (the “Motion”) before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, located at 300 Quarropas St, White Plains, New York 10601, for an Order granting summary judgment in favor of Defendants and dismissing Plaintiff, Gustavia Home, LLC’s adversary proceeding against them pursuant to Federal Rule of Civil Procedure 56, made applicable by Federal Rules of Bankruptcy Procedure 7056, and Local Bankruptcy Rules 7056-1 and 9006-1 of the United States Bankruptcy Court for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Motion must be in writing, filed with the Bankruptcy Court, and served so as to be received by the undersigned counsel before 4:00 p.m. on August 22, 2018. Only those objections timely made, filed, and received will be considered at the hearing.

Dated: June 22, 2018
New York, New York

MCGLINCHEY STAFFORD

By: /s/ Kristen D. Romano
Brian S. McGrath
Kristen D. Romano
112 West 34th Street, Suite 1515
New York, New York
Ph. (646) 362-4000
Fax: (646) 439-8059

*Counsel for Defendants Deutsche Bank
National Trust Company, as Trustee for First
Franklin Mortgage Loan Trust 2006 FF9,
Mortgage Pass-Through Certificates, Series
2006-FF9 and Specialized Loan Servicing,
LLC*